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FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Policies and Rules Concerning)
Children's Television)
)
Revision of Programming Policies)
for Television Broadcast Stations)

MM Docket No. 93-48

COMMENTS

The Office of Communication of the United Church of Christ hereby submits the following Comments in the above captioned proceeding concerning rules and policies with regard to children's television programming.

INTEREST OF THE OFFICE OF COMMUNICATION

The Office of Communication of the United Church of Christ is the national communications agency of a 1.6 million member denomination that was formed in 1957 as a result of the union of the Congregational Christian Churches and the Evangelical and Reformed Church. The Office of Communication has a long history of public interest advocacy before the Commission. For more than three decades, the Office of Communication has participated in rulemakings in defense of First Amendment principles and the obligation of television broadcasters to provide a public service. The membership of the Church represents a significant segment of the viewing audience.

RECOMMENDATIONS

1. The Commission should define with greater specificity what is meant by "educational and informational" children's television

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programming. We support CME et al.'s expanded definition of educational/informational programming:

Educational and informational television programming is television programming that genuinely furthers the understanding of children sixteen years of age and under of subjects such as history, science, literature, the environment, drama, music, fine arts, current events, human relations, other cultures, or languages, and of skills such as reading and mathematics which are crucial to a child's development.

We recommend that religion and discussions of positive moral values be included as appropriate topics.

To be credited by the Federal Communications Commission (FCC) as serving the educational and informational needs of children, programming should be created expressly for children and have as one of its primary purposes (as revealed in the overall theme or subject matter of the program, or by identifiable segments within the program) to contribute to the positive growth of the child's cognitive/intellectual and/or social/emotional needs. These programs should be created expressly to inform, not merely to entertain.

2. If the Commission permits stations to count adult and/or all-age programs toward fulfillment of the Act's requirement, it should specify that these programs may be used only as supplemental to a licensee's obligation and not consider them evidence of compliance. In such cases, the licensee should be required to name the program and specify the episode and ways in which it met the requirements of the Act.

3. The Commission should require that educational and informational children's programs be aired during hours when children are likely to be in the viewing audience (e.g. early morning and after school).


4. The FCC should require a minimum of one hour of educational and informational children's programming be aired daily. And these should be in standard program-length segments; public service announcements should not constitute fulfillment of the requirements.

5. The obligations of licensees under the Act should be clearly delineated in Commission rules, with specific numerical goals and mandates. Numerical goals are essential to successful enforcement by an agency which has a small staff to allocate for enforcement and which is charged with policing an industry in which there is a pattern of failure to comply with the law.

6. Non-compliance with FCC rules regarding children's television programming requirements must be considered seriously in the FCC's review of applications for license renewals. The nominal fines levied for violation of advertising limits and processing delays for license renewal have provided insufficient incentive for broadcasters to comply with either the letter or the spirit of the Children's Television Act. Renewal applicants with

questionable records should be designated for hearing. At a minimum, licensees with a record of marginal compliance should be sanctioned with substantial financial penalties in combination with a shortened license period and reporting requirements.

Respectfully Submitted,



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